

# Marketing Policy and Procedures

## Policy

1. This policy supports the Standards for Registered Training Organisations (RTOs) 2015-Standards 4, 5 and 8 and Standard 1 and 7 of ESOS National Code 2007.
2. The College ensures its marketing and advertising of the Australian Qualifications Framework (AQF) and VET qualifications to prospective clients and learners is ethical, accurate and consistent with its scope of registration.
3. The College ensures information disseminated by itself or on its behalf, is both accurate and factual, and:
  - accurately represents the services it provides and the training products on its scope of registration;
  - includes its RTO Code;
  - refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
  - uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4(Standards for Registered Training Organisations (RTOs) 2015);
  - makes clear where a third party is recruiting prospective learners for the College on its behalf;
  - distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party;
  - distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the College;
  - includes the code and title of any training product, as published on the National Register, referred to in that information;
  - only advertises or markets a non-current training product while it remains on the College's scope of registration;
  - only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
  - includes details about any government funded subsidy or other financial support arrangements associated with the College's provision of training and assessment; and
  - does not guarantee that:
    - a learner will successfully complete a training product on its scope of registration;
    - a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2(Standards for Registered Training Organisations (RTOs) 2015); or
    - a learner will obtain a particular employment outcome where this is outside the control of the College.

#### **Additional requirements for courses registered on CRICOS**

- clearly identify the registered provider's name and CRICOS number in written marketing and other material for students, including electronic form, and
    - a. the requirements for acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required and whether course credit may be applicable
    - b. the course content and duration, qualification offered if applicable, modes of study and assessment methods
    - c. campus locations and a general description of facilities, equipment, and learning and library resources available to students
    - d. details of any arrangements with another registered provider, person or business to provide the course or part of the course
    - e. indicative course-related fees including advice on the potential for fees to change during the student's course and applicable refund policies
    - f. information about the grounds on which the student's enrolment may be deferred, suspended or cancelled
    - g. a description of the ESOS framework made available electronically by the Department of Education and Training, and
    - h. relevant information on living in Australia, including:
      - i. indicative costs of living
      - ii. accommodation options, and
      - iii. where relevant, schooling obligations and options for school-aged dependants of intending students, including that school fees may be incurred.
  - not give false or misleading information or advice in relation to:
    - claims of association between providers
    - the employment outcomes associated with a course
    - automatic acceptance into another course
    - possible migration outcomes, or
    - any other claims relating to the registered provider, its course or outcomes associated with the course
    - possible migration outcome, or any other claims relating to the registered provider, its course or outcomes associated with the course
4. The College will not actively recruit a student where this clearly conflicts with its obligations under Standard 7 (Transfer between registered providers)(National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007).
  5. The College uses the Nationally Recognised Training (NRT) logo only in accordance with its conditions of use as permitted where there is a direct relationship to an AQF qualification and/or unit of competency as specified within training packages or VET accredited courses.
  6. The College ensures the marketing of its education and training services is undertaken in a professional manner and maintains the integrity and reputation of the industry and registered providers.
  7. The College must:
    - a. clearly identify the College's legal name, and CRICOS number in written marketing materials for international students, including electronic form.

This means that all written and electronic material that is used for marketing and recruitment of overseas students lists the College's legal entity and CRICOS code. The College's trading name is not required, but may also be included. Examples of marketing material used for recruitment purposes could include:

- information about courses for overseas students including course outlines if used to market courses and recruit students;
  - the homepage of the College's website and pages relating to international student services;
  - information about living in Australia if it is used as a tool to market to and recruit students and if it has been produced for or by the College for the purpose of marketing to and recruiting students;
  - an advertisement for courses for international students in an Australian or foreign newspaper;
  - materials that promote and advertise courses with the College (including cards which may be considered more advertisements than conventional business cards);
  - a letterhead, signature block or footer used in letters making offers to students, promoting courses or for other marketing purposes; and
  - emails that are sent to students offering enrolment or informing students of courses.
- b. not give false or misleading information or advice in relation to:
1. claims of association between providers
  2. the employment outcomes associated with a course
  3. automatic acceptance into another course
  4. possible migration outcomes, or
  5. any other claims relating to the registered provider, its course or outcomes associated with the course.
6. The College will provide learners with information prior to commencement of services including any third party arrangements affecting the delivery of training and/or assessment if applicable.
7. The College will provide or make readily available information to the learner that outlines the services the College will provide the learner, along with the rights and obligations of the learner and the College. This information is contained in the College' marketing materials, Letter of Offer and/ or Written Agreement.
8. The College will ensure that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.
9. The College will be responsible for ensuring transparent and accurate information about College's services and performance is accessible to prospective and current learners and clients of the College, regardless of any arrangements to have this information distributed on behalf of the College.
10. The College will ensure third party arrangements are documented and transparent to facilitate the Regulator's knowledge that such arrangements exist.
11. The College must not actively recruit a student where this clearly conflicts with its obligations under Standard 7 of ESOS National Code 2007 (Transfer between registered providers).

12. The College will ensure consent has been gained from another person or organisation for marketing material such as student testimonials or photos.
13. The CEO will ensure marketing material does not guarantee:
  - A learner will successfully complete a training product
  - A training product can be completed in a manner that does not meet Standards for RTOs 2015 - Standard 1
  - A learner will obtain a particular employment outcome where this is outside the control of the RTO
14. This policy applies to the College's staff.
15. The CEO is responsible for the implementation of the policy and procedures and to ensure that staff are aware of its application and implement its requirements.

## Procedures

1. The Chief Executive Officer (CEO) ensures that:
  - a. the College markets courses within the Scope of Registration with integrity, accuracy and professionalism, avoiding vague and ambiguous statements. No false or misleading comparisons are to be drawn with any other provider or course.
  - b. the College does not state or imply that courses other than those within the Scope of Registration are recognised by the registering authority.
  - c. the College recruits students at all times in an ethical and responsible manner consistent with the requirements of courses.
  - d. application and selection processes are explicit and defensible and equity and access principles are observed.
2. The Marketing materials will advise prospective students of:
  - its Scope of Registration;
  - application processes and selection criteria;
  - fees involved in undertaking training;
  - fees and refund policy and procedures;
  - qualifications to be issued on completion or partial completion of courses;
  - competencies to be achieved during training;
  - assessment procedures including recognition of prior learning;
  - literacy and numeracy requirements;
  - Complaints and Appeals Policy and Procedures;
  - staff responsibilities;
  - facilities and equipment; and
  - student support services.
3. The development of marketing materials including website is overseen and monitored by the Chief Executive Officer.
4. The CEO/ delegate is to sign off all marketing materials. In approving marketing materials for international students, the CEO is to use the Marketing Information and Practices Checklist.

- Approval for marketing materials must be gained prior to release. This approval relates to the accuracy of information contained in any promotion. Release for any material that is related to any joint programs must follow the appropriate third party provider policies and procedures.

#### Process of Approving Marketing Materials for International Students

|    | STEPS  | WHO IS RESPONSIBLE? | COMMENTS   |
|----|--|---------------------|--|
| 1. | Review Marketing Information and Practices Checklist   | Marketing Officer   | Located in the Marketing/ Forms folder   |
| 2. | Produce marketing material artwork.  | Marketing Officer   | Material must adhere to Marketing Information and Practices Checklist  |
| 3. | Complete and sign Marketing Information and Practices Checklist  | Marketing Officer   |  |
| 4. | Photocopy and file completed Marketing Information and Practices Checklist   | Marketing Officer   | For auditing purposes  |
| 5. | Review Marketing Information and Practices Checklist and marketing material artwork for ESOS compliance.                                       | CEO                 |  |
| 6. | Liaise with Marketing team for amendments.   | CEO                 |  |
| 7. | Document amendment communication.  | CEO                 | Print all email correspondence and place in Marketing Material Approval folder.  |
| 8. | Sign Marketing Information and Practices Checklist, print and attach the final approved version of the marketing material and send together to | CEO                 | All Checklist approvals require manual signature and must be sent in hard copy (or scanned copy electronically,) with a print out of the final approved version of marketing material attached |

|    |  |               |  |
|----|--|---------------|--|
|    | Marketing Officer  |               |  |
| 9. | File countersigned approved Marketing Information and Practices Check list and final approved version of marketing material. | CEO/ Delegate | File approved checklist & Marketing Material in Marketing Material approval folder for auditing purposes |

## Timelines

| Responsible | Type of Marketing Material  | Estimated Duration |
|-------------|---|--------------------|
| CEO         | The CEO is to approve marketing materials for international students if it includes the following: course title, CRICOS course code, duration, fees, location, CRICOS provider no.  | 2 days             |
| CEO         | The CEO is to approve marketing material if it includes academic course contents, such as: course outline, entry requirements, Credit transfer / RPL, application method, content, teaching resources, delivery methods, learning facilities, and assessment. | 4-5 Days           |